

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**JILL DILLARD, JESSA SEAWALD,
JINGER VUOLO, and JOY DUGGAR**

PLAINTIFFS

VS.

NO. 17-CV-05089-TLB

**CITY OF SPRINGDALE, ARKANSAS;
WASHINGTON COUNTY, ARKANSAS;
KATHY O'KELLEY, in her individual
and official capacities;
RICK HOYT, in his individual and official capacities;
STEVE ZEGA, in his official capacity;
BAUER PUBLISHING COMPANY, L.P.;
BAUER MAGAZINE L.P.;
BAUER MEDIA GROUP, L.P.;
BAUER, INC.;
HENRICH BAUER NORTH AMERICA, INC.;
BAUER MEDIA GROUP USA, LLC; and
DOES 1-10, inclusive**

DEFENDANTS

MOTION FOR SUMMARY JUDGMENT

Come now the Separate Washington County Defendants, and for their Motion for Summary Judgment, do state:

1. The Plaintiffs in this case initially sued a host of Defendants under a number of legal causes of action, however, most of those claims against many of those Defendants have now been dismissed. As against the "Separate Washington County Defendants" - Rick Hoyt and Washington County - the Plaintiffs' remaining claims are: 1) tort of invasion of privacy – public disclosure of private fact in violation of Arkansas law; 2) tort of invasion of privacy – intrusion upon seclusion in violation of Arkansas law; and 3) tort of outrage in violation of Arkansas law. Doc. # 1.

2. For the reasons set forth in the accompanying brief and statement of facts, which are adopted and incorporate herein by reference, as if set forth word for word, the Separate Washington County Defendants are entitled to qualified immunity, statutory tort immunity, vicarious liability immunity, and summary judgment as a matter of law.

Wherefore, the Separate Washington County Defendants respectfully request that they be granted statutory tort immunity, qualified immunity, vicarious liability immunity, and summary

judgment as a matter of law and that Plaintiff's Complaint be dismissed.

Respectfully submitted,

Rick Hoyt & Washington County,
Separate Washington County Defendants

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